

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

v.

BHASKAR SAVANI, et al.

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:

Crim No. 2:23-cr-00016 JLS

ORDER

AND NOW, this day of May, 2023 upon consideration of Defendants Bhaskar, Arun and Niranjana Savani's emergency motion for a temporary modification of their conditions of pre-trial release to allow periodic travel to New York, New Jersey and the Middle and Western Districts of Pennsylvania for a charitable purpose, and the government's response to same, it is hereby **ORDERED** that the Motion is **GRANTED**.

It is hereby **ORDERED** that Bhaskar, Arun and Niranjana Savani are permitted to travel to New York, New Jersey and the Middle and Western Districts of Pennsylvania for the purpose of picking up mangos imported from India and delivering them to customers in said areas until July 5, 2023, with notification provided to Pre-Trial Services of the dates, places and duration of travel.

Honorable Jeffrey L. Schmehl
United States District Judge

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	
	:	
v.	:	Crim No. 2:23-cr-00016 JLS
	:	
BHASKAR SAVANI, et al.	:	
	:	

**DEFENDANTS' EMERGENCY MOTION FOR TEMPORARY MODIFICATION OF
PRE-TRIAL RELEASE CONDITIONS TO ALLOW PERIODIC TRAVEL TO NEW
YORK, NEW JERSEY, AND THE MIDDLE AND WESTERN DISTRICTS OF
PENNSYLVANIA FOR A CHARITABLE PURPOSE**

1. Defendants Bhaskar, Arun and Niranjana Savani ("The Savani Brothers"), by their undersigned counsel, seek a short-term modification of their pre-trial release to travel to New York, New Jersey and the Middle and Western Districts of Pennsylvania to deliver mangos imported from their family-owned farm in India to existing and new customers in those areas from now until mid-July 2023 in order to further their charitable efforts to aid impoverished residents of rural India.
2. The Savani Brothers, along with their parents, established a mango farm, with packing facilities, in India named "Savani Farms," which has been exporting mangos to the United States since 2007. In collaboration with other mango farms in rural India, Savani Farms exports cases of mangos to the United States during the harvest season which begins in early May and ends in early July. The mangos are primarily sold to retail and food service customers of Indian heritage.
3. All customers to whom the deliveries are made are independent businesses, and none of them are related to the persons, companies or other entities identified in the Indictment.
4. All proceeds of the mangos sold in the United States are contributed back to rural India

for charitable purposes. Savani Farms has, by way of example, built schools, health clinics, sponsored education and helped develop infrastructure projects including renewable energy and water resource ecosystems in India. The goal of Savani Farms is to improve the socio-economic structure of Indian rural communities through the marketing of mangos, a seasonal crop, in the United States. *See* Savani Farms Mission Mango Statement attached to this Motion as Exhibit “A.”

5. Prior to the Covid 19 pandemic, the Savani Brothers helped deliver mangos to customers within a reasonable driving distance of their primary dental offices in this District to maximize the amount of money sent back to India from the sale of mangos. They also, however, used ground delivery services to pick up the mangos which arrive by air freight to Newark and La Guardia airports and deliver them to customers in New York, New Jersey, and Pennsylvania. Since the pandemic, however, the cost of rapid ground delivery to customers in the tri-state area has escalated, decreasing the amount of revenue sent back to the rural Indian communities for charitable purposes.

6. Since the beginning of May, the Savani Brothers have asked family members and friends to help with the mango deliveries. However, these individuals are employed and have other responsibilities and are thus unable to take a full day to continue making deliveries.

7. Some of the trips may require an extension of the 7:00 AM to 10:00 PM curfew under their current pre-trial conditions or overnight stay when the Savani Brothers are making multiple customer deliveries in locations such as Western Pennsylvania and upstate New York.

8. Because of their extreme perishability, fresh mangos must be delivered to retailers and

food service customers within about 24-48 hours from the time they arrive in the United States by air freight. Moreover, the heart of the harvest and delivery season is now. The Savani Brothers therefore respectfully request an expedited ruling on this motion.

9. For all of the reasons set forth above, the Savani Brothers seek a temporary modification of their pre-trial release conditions to allow them to make periodic trips to deliver mangos to customers located in the aforesaid areas, with the condition that they provide advance notification to their pre-trial services officer(s) with respect to the dates, times and locations of each of their respective trips.

10. Defense counsel has conferred with Government counsel concerning this motion, and Government counsel has advised defense counsel that it will not consent to same. Therefore, the Savani Brothers respectfully request that the Court require an expedited response to this motion by the Government.

WHEREFORE, Defendants, Bhaskar, Arun and Niranjan Savani, respectfully request that an Order be entered by Court in the form of the Proposed Order submitted herewith.

Respectfully Submitted

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Counsel for Arun Savani

Exhibit A

Savani Farm's Mission Mango:

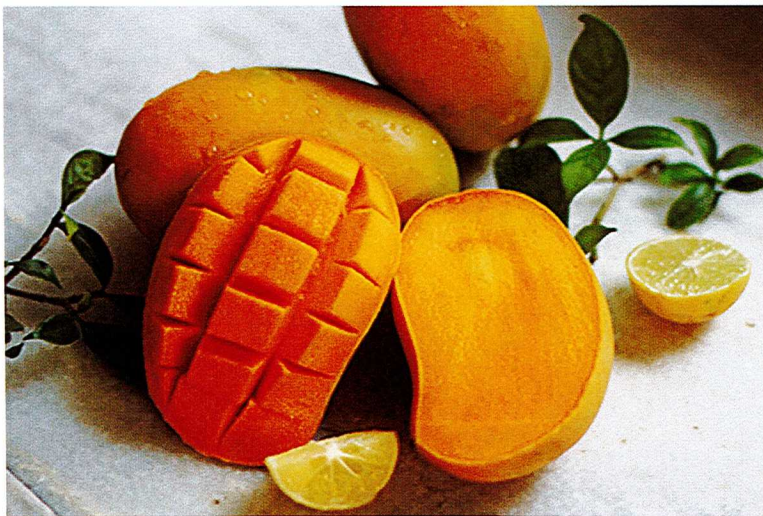
Introduction:

Mission Mango is a passionate endeavor dedicated to spreading the love and appreciation for Indian mangoes worldwide. Our mission is to showcase the exquisite taste, versatility, and cultural significance of this "King of the Fruit"-Indian Exotic Mangoes. Through education, promotion, and community engagement, we strive to create a mango-loving community that celebrates the rich flavors and diversity of Indian mango varieties.

Mango Philanthropy: Embracing Good Karma-Planting Seeds of Goodness

At Savani Farms, through Mission Mango our intent is:

- *To participate and contribute to uplifting the socio-economic structure of rural communities of India, especially farming community through creation of new market for their produce*
- *To create sustainable green belts/corridors to preserve and support very fragile ecosystems of India*
- *To provide environmental education to young inhabitants of rural India*
- *To promote responsible & sustainable agriculture*
- *To support renewable energy & water resources of rural India*



Promoting Responsible & Sustainable Agriculture of Rural India:

- Collaborating with rural farmers of India, agricultural organizations, and universities to conduct workshops and seminars on mango cultivation, promoting sustainable farming practices and highlighting the economic potential of mango production.
- Promoting sustainable farming practices and provide support to mango farmers in rural India, helping them improve their livelihoods and access to markets.
- Establishing programs to empower young farmers and researchers, fostering innovation and knowledge-sharing within the mango farming community.

Conclusion: Our Mission Mango aims to promote and celebrate the irresistible charm of Indian mangoes. It invites people from all walks of life to join in on the journey of spreading mango magic worldwide. The goal is to make Indian mangoes more accessible, diverse, and sustainable, while also highlighting their cultural significance. Through education, promotion, and community engagement, Mission Mango aims to create a world where the tantalizing aroma and incomparable sweetness of mangoes bring joy and smiles to people everywhere. By embracing the mango's allure, the organization seeks to unite individuals in the pure joy of this remarkable fruit, transcending borders and creating a legacy of mango love. It invites everyone to be a part of this extraordinary journey, transforming the world into a sweeter place, one delicious mango at a time.



Farm-to-Fork : What difference it can make?

It has long been the dream of Savani Farms to make efforts towards improving the socio-economic standards of the underprivileged farmers in India. Mango trade in India is heavily controlled by contractors and middlemen. The small farmers that depend on them for the sale of their mangoes end up receiving a very small portion of the profit. They are forced to live on this income until the next harvest. It is this distraught, socio-economic standard of the Indian farmers that led Savani Farms to take initiatives in trying to eradicate their poverty and help them get a fair price for their produce.

Farm-to Fork aims at eliminating the middleman completely from the mango supply chain and bring the produce directly from farmers to consumers. It aims at helping farmers get a fair price for their hard work and thus help them sustain themselves and their families and live a better-quality life.

At Savani farms whatever income is generated through mango trade, is given back to the community. In the past, Savani farms has built schools, health clinics, sponsored education, and contributed towards developing villages and improving their infrastructure. We hope to continue the same in the future.

MISSION MANGO

Indian FARM to American FORK
What Difference it can make ?



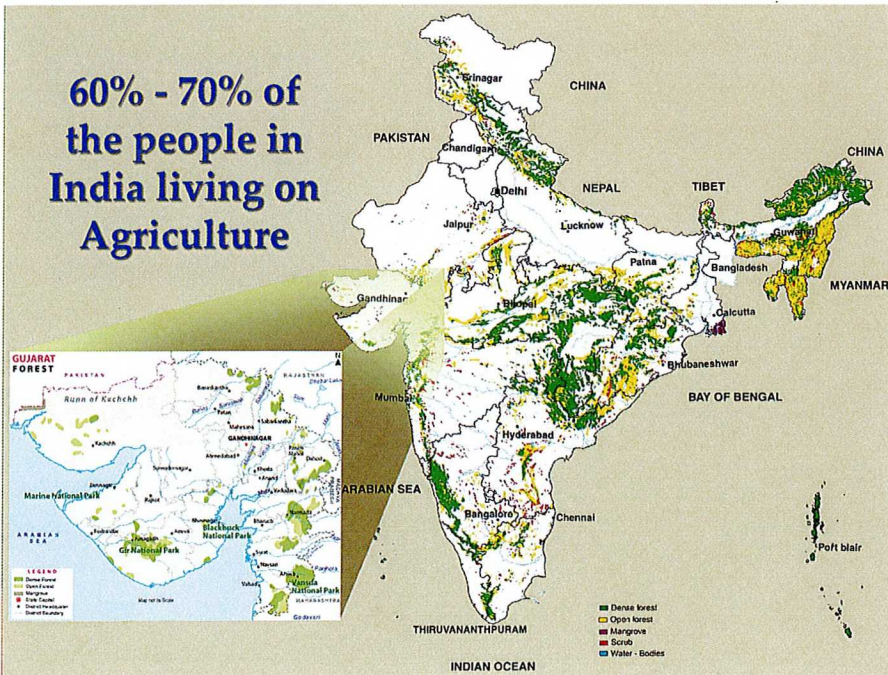
Lifting up the Indian Mango Ban in USA
First Legal Import Of Indian Mangoes in The USA
(27th April-2007)



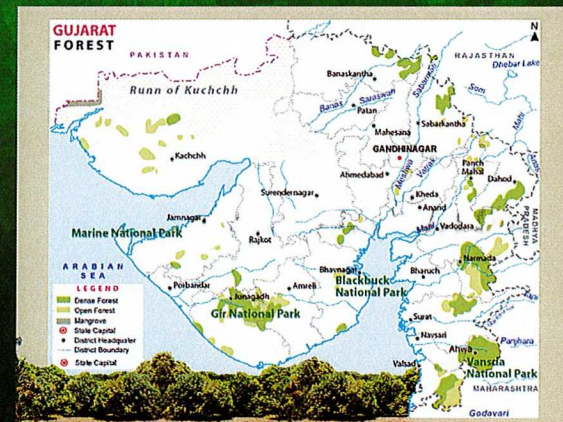
visit us at
www.SavaniFarms.com



**60% - 70% of
the people in
India living on
Agriculture**




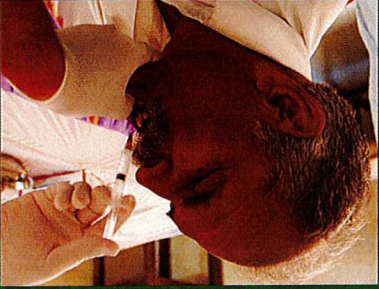

Gujarat State-India
Isolated Wild Habitats
23 Sanctuaries, 4 National Parks and very few Protected Area
All Isolated Habitats-No Connectivity for Migration



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Dental/Medical Camps Preventative Care Awareness

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Community Outreach Supporting Programs for Health Check ups & Awareness

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Investing Profit into Local Community Creating Water Reservoirs/Basins


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- To Make the project Renewable, Sustainable and Profitable
- To Bring strategic investors seeking diversified portfolio of Investment
- Creation of man-made water reservoirs
- Application of Water conservation technology
- Improving Ground Water Table
- Creating Greenbelts and corridors to preserve Ecosystem

Project @ Ghoba Village




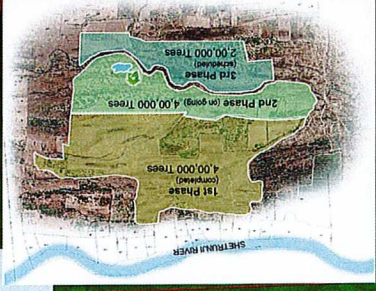
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- Conservation of Native Flora and Fauna
- Countering the Climate Change and expanding carbon credit footprint
- Promoting Eco Tourism and bring Revenue to Rural People
- Creating local employment through establishing value-added product projects
- Producing earth friendly products
- Strengthening Rural economy

Project Ghoba Village

visit us at
www.SavaniFarms.com

1st Phase (on going) 4,00,000 Trees
2nd Phase (on going) 4,00,000 Trees
3rd Phase (on going) 2,00,000 Trees

Link to location
<https://goo.gl/maps/xmE5sr5p0t4SH1iq7>

- Ghoba To Amreli - 52Km
- Ghoba To Bhavnagar - 94Km
- Ghoba To Ahmedabad - 247Km
- Ghoba To Surat - 468Km

LOCATION

CERTIFICATE OF SERVICE

I hereby certify that the foregoing motion was filed and served upon counsel for all parties to this criminal case this 22nd day of May by way of the ECF system in use by the United States District Court for the Eastern District of Pennsylvania.

Dated May 22, 2023

/s/ William A. DeStefano